

Memorandum

To: Jim Johnson, OSHA Technical Section

From: Dale M. Prokopchak, CIH, CSP
Earth Tech

DP

Date: January 15, 1999

Re: Filling Mine Safety Appliance (MSA) Self-Contained Breathing Apparatus (SCBA) and 5 Minute Egress Bottles

Earth Tech is under contract with the United States Environmental Protection Agency (EPA) to provide hazardous waste clean-up at its Superfund sites. During work activities in Level B personal protective equipment (PPE), site personnel refill SCBA/5 minute emergency egress bottles by means of a cascade system. Prior to performing this task, personnel are trained in the classroom (HAZWOPER OSHA 40) and "hands-on" in the field by Earth Tech supervisors/Response Managers experienced in this activity. Earth Tech employs the buddy system and wears appropriate head/face protection during filling operations. Furthermore, this topic is periodically addressed in the morning safety meetings.

Is there any additional guidance and/or recommendations you can provide for this operation? We had not experienced any problems with our approach, yet are constantly looking at methods to improve site operations. Richard Graham, of MSA, provided us with your name as a technical contact.

I would appreciate any thoughts/comments be directed to my fax number at (804)358-7910. I appreciate your time and concern.

E A R T H

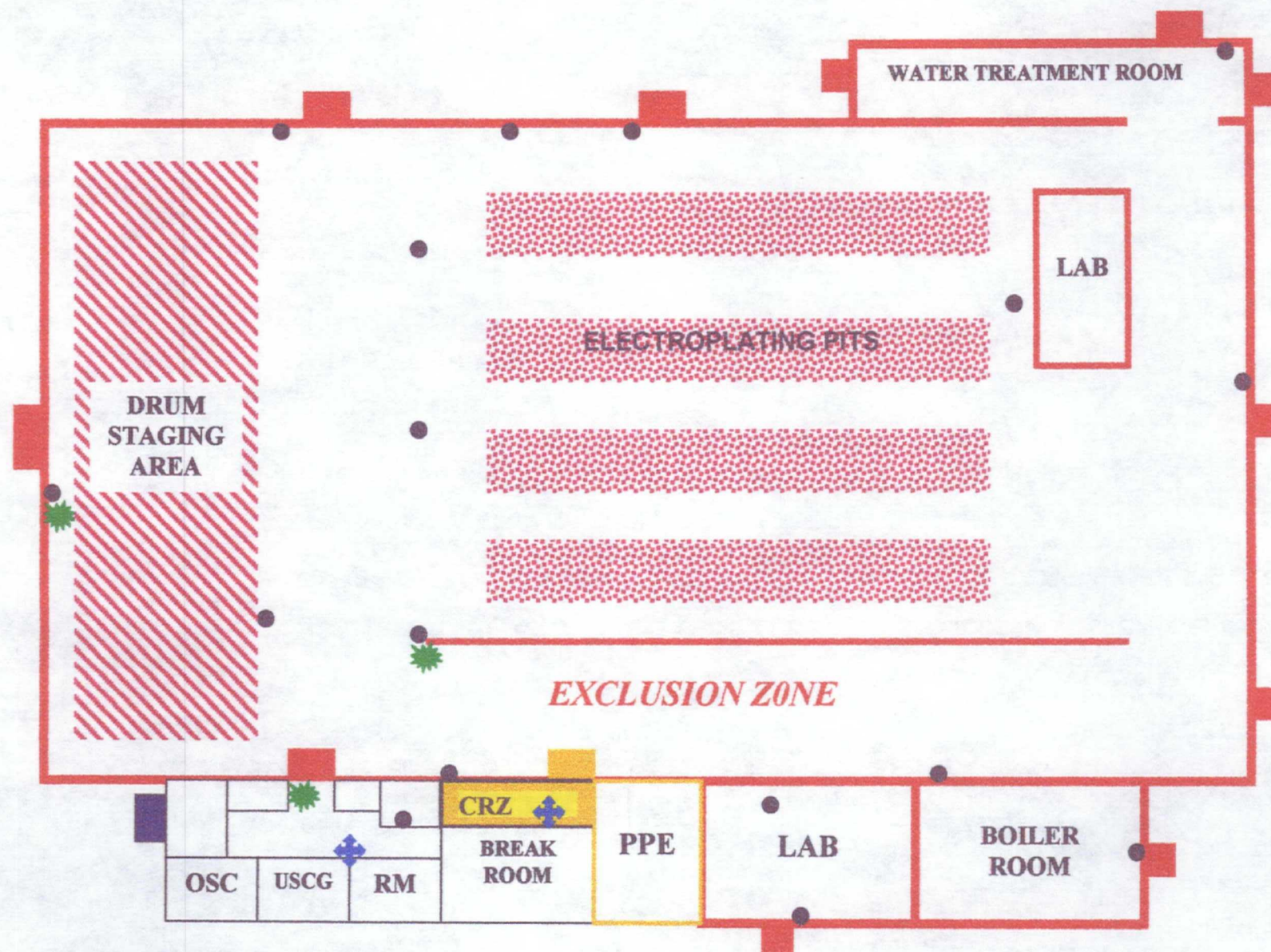


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